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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ROBYN J. WILLIAMS,

Plaintiff

v.

CAROLYN W. COLVIN, Acting  
Commissioner of Social Security,

Defendant.

) Case No: 2:16-cv-00701-GMN-GWF

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**JOINT STIPULATION FOR EXTENSION  
OF TIME TO FILE DEFENDANT'S  
CROSS-MOTION TO AFFIRM**

**(First Request)**

1 Plaintiff Robyn J. Williams (Plaintiff) and Defendant Carolyn W. Colvin, Acting  
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,  
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty days  
4 from October 3, 2016 to November 2, 2016. This is the Commissioner's first request for an  
5 extension.

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18 There is good cause because, since Plaintiff filed her Motion For Reversal And/Or Remand  
19 (Plaintiff's Motion), counsel has been handling a large number of District Court and Ninth Circuit  
20 cases in addition to this one, with seven briefs due within the next twenty-four days. Additionally,  
21 the Commissioner's counsel has had numerous other deadlines, including a District Court brief  
22 filed September 30, 2016, five other District Court briefs filed, as well as several end-of-fiscal year  
23 training courses, a number of conferences in an employment case, a settlement agreement, and  
24 multiple mentoring and reviewing duties in the Office of the General Counsel. Counsel was also  
25 out of the office for approximately two days. As result, the Commissioner needs additional time  
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1 to respond properly to the issues Plaintiff raised in her Motion. Plaintiff has no objection.

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3 Respectfully submitted,

4 Date: September 30, 2016

GERALD M. WELT  
Attorney at Law

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6 By: /s/\* Cyrus Safa  
CYRUS SAFA  
\*by email authorization on 9/30/16

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8 Attorneys for Plaintiff

9 Date: September 30, 2016


DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

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12 By: /s/ April A. Alongi  
APRIL A. ALONGI  
Special Assistant United States Attorney

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14 Attorneys for Defendant

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19 IT IS SO ORDERED.

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22  
23 DATE: October 3, 2016

  
THE HONORABLE GEORGE FOLEY, JR.  
United States Magistrate Judge

**DEFENDANT'S CERTIFICATE OF SERVICE**

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (First Request) to be served, via CM/ECF notice, on:

CYRUS SAFA  
Attorney at Law  
rohlfig.office@rohlfiglaw.com

Respectfully submitted,

Date: September 30, 2016

DANIEL G. BOGDEN  
United States Attorney  
DANIEL G. BOGDEN  
Chief, Civil Division

By: /s/ April A. Alongi  
APRIL A. ALONGI  
Special Assistant United States Attorney

Attorneys for Defendant